

PPL Services Corp.
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.4848 Fax 610.774.5930
www.pplweb.com

March 31, 2003

Rebecca E. Kane
U.S. Environmental Protection Agency
Ariel Rios Building (MC: 2222A)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: PPL Comments Regarding EPA's Enforcement Compliance History Online

Dear Ms. Kane:

PPL Corporation (NYSE: PPL), headquartered in Allentown, Pa., controls about 11,500 megawatts of electricity generating capacity in the United States, sells energy in key U.S. markets and delivers electricity to customers in Pennsylvania, the United Kingdom and Latin America. PPL appreciates the opportunity to provide comments on the ECHO initiative.

PPL supports EPA's efforts to disseminate accurate facility compliance information. While public access to this information is appropriate, there are shortcomings to the pilot web site that should be corrected if the public is to have accurate and meaningful information about the compliance of the facilities contained in the database.

Before PPL responds to the questions presented in EPA's Federal Register announcement we want to emphasize a specific concern that we have. The EPA must recognize the dangers associated with making security sensitive data easily accessible and widely available. Access to sensitive information particularly information on chemicals, amounts and their exact location combined with the detailed infrastructure information such as density of the population surrounding the facility, locations of churches and schools and ethnic profiles of the surrounding area can pose an extreme threat to Homeland Security.

The following are responses to the questions presented in the Federal Register announcement.

Does the site provide meaningful and useful information about the compliance and enforcement program?

Information in the database was inaccurate and misleading. Factual errors existed that needed to be corrected. Errors range from input errors to errors in facility ownership. The site also does



not accurately represent a facilities compliance status. The database indicates non-compliance as the time from which a formal complaint is issued until the time that a complaint is resolved. However, actual non-compliance may be corrected before the formal complaint is issued or some time prior to when the complaint is officially resolved. At the present time, there does not appear to be any way to reflect the “actual” compliance record of the facility. In a sense, the database better reflects the timeliness of complaint resolution rather than the actual amount of time that a facility is out of compliance.

Is the site easy to navigate?

The site is relatively easy to navigate however, review of the site-specific data was difficult, if not impossible in several instances. The database codes were difficult to interpret and the unexplained acronyms frustrating. This data could be easily “misread” by the general public who does not have experience with environmental reporting requirements.

Also, searching can be a problem. Searches PPL performed resulted in an extensive list of facilities, some of which were owned by PPL and others which were not. PPL has received numerous calls regarding facilities not owned by PPL. Presumably the callers were misled by information contained in databases such as ECHO.

Does the help text adequately explain the data?

ECHO users can be misled by the way in which ECHO reports non-compliance. For example, the database contains numerous examples where a facility is noted to be out of compliance, however, that facility may be addressing the issue under a consent order or other administrative means. The facility is acting appropriately and compliant with the law, yet ECHO still lists the facility as out of compliance until item is completely resolved. If the user does not have a good understanding of the history or the specifics of any given issue it appears the facility is continually out of compliance, when it may not be and the situation is being rectified.

The easy availability of this inaccurate or misleading data to the public and the deficient error reporting process may impose significant and unwarranted harm to shareholder confidence and subsequently the economic viability of the company.

What additional features, content, and/or modifications would improve the site?

Eliminate access to sensitive information that may impact Homeland Security.

Were the facility reports accurate?

A variety of errors were observed in the reports. The following are some examples:

- For several facilities, the address given on the permits and consequently in the ECHO database are the same -- a centralized location. Therefore, the demographic information contained in the ECHO database is based on a location different from the actual facility.
- In some instances, the ECHO database did not reflect the sale of facilities to a different corporate entity that occurred a significant time in the past.
- Alleged violations of new source review requirements were listed not just when a notice of violation was issued but for every quarter since then.

- Facilities noted that the database reported them as “out of compliance” after the issuance of a notice of violation. However, in most instances the matter had been resolved.
- Different permits for the same facility had different names for the facility.

If you need to submit an online error report, was the error reporting easy to use?

The system was relatively easy to use however, several weeks passed before we were aware that the changes were accepted. Also, the error correction process should be improved to prevent anyone without knowledge of the facility from making corrections to specific data represented in the database. Currently, anyone has the authority to request correction and/or revision of the data.

PPL appreciates this opportunity to provide its comments on the ECHO database. If there are any questions about our comments or the issues that were raised, please contact William Brensinger at 610-774-4666.

Sincerely,

William K. Brensinger
Senior Environmental Professional
Wkbrensinger@pplweb.com

